

U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 27, 2020

BY ECF

The Honorable Alison J. Nathan
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The Defendant shall file his brief no later than July 28, 2020. The Government shall submit its opposition no later than July 29, 2020. The Defendant may file a reply no later than July 30, 2020.


Re: *United States v. Jesus Rivera*, 20 Cr. 304 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter regarding Defendant Jesus Rivera's anticipated renewed request for bail. On July 20, 2020, the Court held an initial conference in this case, at which defense counsel stated his intention to renew the Defendant's request for bail. (*See* Dkt., Minute Entry, dated July 20, 2020.) Later that day, the Court issued an Order scheduling "a bail hearing in the week of August 3, 2020," and ordering the Defendant "to submit briefing no later than July 24, 2020 and the Government to submit an opposition no later than July 28, 2020." (Dkt. No. 23.) This afternoon, the Government conferred with defense counsel, who mistakenly believed that the Defendant's submission was due tomorrow. Defense counsel intends to file a renewed bail request, as well as a letter regarding the Defendant's request to inspect grand jury records (*see* Dkt. No. 17), by tomorrow. Accordingly, the Government respectfully requests a 24-hour extension of its July 28 deadline, so that it has sufficient time to review and to address the arguments raised in the Defendant's forthcoming bail request.

Respectfully submitted,

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